Section 1. Registration Information

Source Identification

Facility Name:	Green Gate Fresh
Parent Company #1 Name:	Green Gate Fresh, LLLP
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	First-time submission
Subsequent RMP Submission Reason:	
Description:	
Receipt Date:	06-Oct-2011
Postmark Date:	06-Oct-2011
Next Due Date:	06-Oct-2016
Completeness Check Date:	06-Oct-2011
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0021 3299
Other EPA Systems Facility ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	3255 S. Ave 3 1/2 E
Street 2:	P.O. Box 1269
City:	Yuma
State:	ARIZONA
ZIP:	85365
ZIP4:	
County:	YUMA

Facility Latitude and Longitude

Latitude (decimal):	32.668333
Longitude (decimal):	-114.570556
Lat/Long Method:	Interpolation - Digital map source (TIGER)
Lat/Long Description:	Center of Facility
Horizontal Accuracy Measure:	10
Horizontal Reference Datum Name:	World Geodetic System of 1984
Source Map Scale Number:	

Owner or Operator

Operator Name:	Green Gate Fresh LLLP
Operator Phone:	(831) 783-1601

Mailing Address

Operator Street 1:	PO Box 849
Operator Street 2:	
Operator City:	Salinas
Operator State:	CALIFORNIA
Operator ZIP:	93901
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Kenneth Brown
RMP Title of Person or Position:	Operations Manager
RMP E-mail Address:	kenneth.brown@greengatefresh.com

Emergency Contact

Emergency Contact Name:	Kenneth Brown
Emergency Contact Title:	Operations Manager
Emergency Contact Phone:	(928) 580-2149
Emergency Contact 24-Hour Phone:	(928) 580-2149
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	kenneth.brown@greengatefresh.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	
Facility or Parent Company WWW Homepage Address:	

Local Emergency Planning Committee

LEPC:	Yuma County LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	50
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	
Air Operating Permit ID:	

OSHA Ranking

OSHA Star or Merit Ranking:	

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	
Last Safety Inspection Performed By an External Agency:	Fire Department

Predictive Filing

Did this RMP involve predictive filing?:	

Preparer Information

Preparer Name:	Axiom Engineers
Preparer Phone:	(831) 649-8000
Preparer Street 1:	22 Lower Ragsdale Dr.
Preparer Street 2:	
Preparer City:	Monterey
Preparer State:	CALIFORNIA
Preparer ZIP:	93940
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:	
Substantiation Provided:	
Unsanitized RMP Provided:	

Reportable Accidents

Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	1000022332
Description:	Basic Inorganic Chemicals
Process Chemical ID:	1000026441
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	14000
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	1000022332
Process NAICS ID:	1000022634
Program Level:	Program Level 3 process
NAICS Code:	115114
NAICS Description:	Postharvest Crop Activities (except Cotton Ginning)

Process ID:	1000022332
Process NAICS ID:	1000022635
Program Level:	Program Level 3 process
NAICS Code:	49313
NAICS Description:	Farm Product Warehousing and Storage

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000018298

Percent Weight:	100.0
Physical State:	Gas liquified by refrigeration
Model Used:	Areal Locations of Hazardous Atmospheres [ALOHA(R)]
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Rural

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000019834

Percent Weight:	100.0
Physical State:	Gas liquified by refrigeration
Model Used:	Areal Locations of Hazardous Atmospheres [ALOHA(R)]
Wind Speed (m/sec):	7.5
Atmospheric Stability Class:	D
Topography:	Rural

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	
Emergency Shutdown:	
Other Type:	

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

No description available.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000022482
Chemical Name:	Ammonia (anhydrous)
Flammable/Toxic:	Toxic
CAS Number:	7664-41-7
Prevention Program Level 3 ID:	1000018884
NAICS Code:	115114

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	01-Nov-2010

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	11-Nov-2010

The Technique Used

What If:	
Checklist:	
What If/Checklist:	Yes
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	31-Oct-2011

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	Yes
Floods (Flood Plain):	

Tornado:
Hurricanes:
Other Major Hazard Identified:

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	
Backup Pump:	
Grounding Equipment:	
Inhibitor Addition:	
Rupture Disks:	
Excess Flow Device:	
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	
Dikes:	
Fire Walls:	
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	
Neutralization:	
None:	Yes
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:
Increase in Chemical Inventory:
Change Process Parameters:
Installation of Process Controls:
Installation of Process Detection Systems:

Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	Yes
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	01-Nov-2010

Training

Training Revision Date (The date of the most recent review or revision of training programs):	01-Nov-2010

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	
Oral Tests:	
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	01-Nov-2010
Equipment Inspection Date (The date of the most recent equipment inspection or test):	11-Sep-2009
Equipment Tested (Equipment most recently inspected or tested):	Refrigeration equipment-A.S. Portables

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	01-Nov-2010

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	01-Nov-2010

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	01-Nov-2010

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):	Yes
Facility Plan (Does facility have its own written emergency response plan?):	Yes
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	Yes
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	Yes
Healthcare (Does facility's ER plan include information on emergency health care?):	Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):	01-Nov-2010

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	05-Nov-2010

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	Yuma County LEPC
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(928) 373-1093

Subject to

OSHA Regulations at 29 CFR 1910.38:	Yes
OSHA Regulations at 29 CFR 1910.120:	
Clean Water Regulations at 40 CFR 112:	
RCRA Regulations at CFR 264, 265, and 279.52:	
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:	
State EPCRA Rules or Laws:	Yes
Other (Specify):	

Executive Summary

Release Prevention and Emergency Response Policy
Green Gate Fresh LLLP operates a fresh salad processing and shipping facility in Yuma, AZ. Risk prevention and emergency response procedures are in place at this facility, as documented here. GreenGate Fresh LLLP hires outside contractors to maintain the ammonia refrigeration equipment in order to prevent accidents. The Emergency Response Plan lists the responsible personnel and the policies for responding to an accident involving the regulated substance.

There are both portable and fixed refrigeration systems onsite and all have safeties to detect unsafe operating conditions. Fixed and portable equipment support the cold storage rooms, processing facility, and vacuum pre-cooling equipment. The portable equipment is located outdoors, and has no detection system. Fixed equipment is located within the facility and includes the fan coil units and piping. Operators monitor the system when it is operational.

Green Gate Fresh LLLP utilizes inspection procedures to review refrigeration equipment prior to startup and during operations. These procedures identify potential sources of release and equipment corrections required to prevent these releases. Onsite personnel and certified refrigeration contractors review the equipment as required.

Onsite personnel provide initial emergency response. Onsite personnel will make a preliminary assessment in the event of a release and will provide first response. First response may include emergency equipment shutdown, system isolation, or controlled operation such as pump down to prevent or reduce an offsite release. No emergency operations will be performed that are beyond the capabilities of the operators or other onsite personnel. Local fire and police departments with mutual aide response will provide emergency response for a major release event. The refrigeration contractors would also be on-call to provide emergency response.

Emergency response training will be conducted yearly for current employees and as required for new employees. Records will be kept of all training performed at the site for a minimum of five (5) years.

Description of Stationary Source and Substance Handled
GreenGate Fresh LLLP, located at 3255 South Avenue 3 1/2 E, Yuma, Arizona, utilizes anhydrous ammonia as a refrigerant in their operations. The ammonia refrigeration systems are used for vacuum cooling, produce cooling, and cold storage prior to shipment. There are two interconnected systems at the facility. The system as a whole has both portable and fixed equipment. The new facility was constructed as per applicable codes and industry standards.

The total charge for all the refrigeration systems is approximately 14,000 lb.
The refrigeration systems at this facility are single-stage vapor compression cycles. The refrigeration systems consist of the following equipment:
Â¿ Compressors,
Â¿ Low pressure receivers,
Â¿ A high pressure receiver,
Â¿ Evaporative cooling condensers,
Â¿ Air cooling evaporators,
Â¿ An ammonia diffuser tank,
Â¿ Ammonia pumps,
Â¿ Water pumps,
Â¿ Water chillers,
Â¿ Shell and tube heat exchangers,
Â¿ A low pressure recirculator,
Â¿ Oil separators,
Â¿ Oil coolers,
Â¿ An electric control box,
Â¿ A refrigeration control panel, and
Â¿ An emergency electric shut-off switch.

The ammonia refrigeration equipment inspection checklists describe equipment details.

The substance handled at GreenGate Fresh LLLP, anhydrous ammonia (NH3), is a gas in its natural state and is extremely irritating

to mucous membranes and lung tissue. The gas is pungent and may cause suffocation, as shortness of breath and labored breathing can develop if inhaled. Prolonged inhalation of high concentrations may cause bronchitis and/or pneumonia, with some residual reduction in pulmonary functions. Repeated or prolonged contact of high concentrations of ammonia to the skin can cause frostbite, redness, pain, and serious skin burn. A Material Safety Data sheet (MSDS) for ammonia is included in the RMP binder, which is avilable to all employees at the facility. Written in both Spanish and English, the MSDS details the chemical properties and health hazards of anhydrous ammonia.

Accidental Release Prevention Program
GreenGate Fresh LLLP maintains an accidental release prevention program designed to eliminate or minimize ammonia releases. The program includes equipment monitoring, regular inspections and maintenance, and log keeping of operating conditions, scheduled maintenance, emergency response, and operator training.

The ammonia refrigeration system has specific safety measures in place to prevent accidental release. Operators and mechanics are trained for safe operation and maintenance of the refrigeration system. They are also trained in emergency response procedures in the event of an ammonia release. An alarm and detection system monitors the facility for unsafe ammonia concentration levels and for operating conditions outside of safety set points. Monitoring is done 24 hours per day. Relief valves are installed to protect both the high and low sides from an overpressure situation. Relief valves are piped to a diffusion tank, which provides a system-wide mitigation measure. Compressors have control panels, which will automatically shut down the compressors if pressure and temperature set points are exceeded. An emergency control box allows system pressures to be relieved without releasing to the ambient. Additional information about the ammonia detection system and the sensor locations can be obtained from the drawings in the RMP binder.

A thorough review of the system including a "What If" Process Hazard Analysis (PHA) was performed for this facility. Equipment corrections and updates were made for those items determined to have the highest potential for offsite releases.

Safety and equipment operational training will be conducted, at a minimum, at least once per year. Training topics will include equipment operational procedures, emergency response procedures, a review of the Risk Management Plan, a review of the Business Response Plan, and evacuation procedures. Sample forms for documenting training are included in the RMP binder.